Batch Validation Questions and Answers

1. What is Batch Validation?

   Batch validation is a process performed on batch files submitted to the Bank Secrecy Act (BSA) E-Filing System to help ensure the quality of the BSA data. The data validation routine is based upon a set of validation rules driven by the current BSA Electronic Filing Specifications. At this time, batch validation only applies to batch files containing Currency Transaction Report (CTR), Designation of Exempt Person (DEP), and Currency Transaction Report by Casinos (CTR-C) data.

2. Why is Batch Validation necessary?

   Batch validation ensures the batch files meet the formatting requirements defined by FinCEN in the appropriate BSA Electronic Filing Requirements document:

   - *BSA Electronic Filing Requirements for the Currency Transaction Report (CTR) (FinCEN Form 104) and Designation of Exempt Person (DEP) (FinCEN Form 110)*

   - *BSA Electronic Filing Requirements for the Currency Transaction Report by Casinos (CTR-C) (FinCEN Form 103)*

   If a batch file does not comply with formatting requirements, then the batch file may be **Accepted with Warnings** or **Rejected,** depending on the severity of the data issues. This ensures that the data submitted is properly formatted and that errors found during the batch validation process can be corrected in a timely manner.

3. How will Batch Validation be rolled out?

   FinCEN will use a two-stage approach to implement Batch Validation. The **first stage** will permit *all* submissions that do not correspond to formatting requirements to be **Accepted with Warnings** for a period of six months. This will provide financial institutions with time to become familiar with the new process. FinCEN plans to review the process at three months to determine if the initial six-month period should be extended. Once the **second stage** is initiated, submissions will either be **Accepted with Warnings** or **Rejected,** depending on the severity and number of the data issues.

4. How long will users have to correct a filing?

   Users need to track the status of their filings in **Track Status** to ensure the batch files are submitted successfully within the *designated filing deadlines*.

   - *If a batch is **Accepted with Warnings** – the institution must wait until it receives the Acknowledgement file from the Enterprise Computing Center – Detroit (ECC-D) to correct and resubmit the batch submission. The institution must wait for the Acknowledgement file because corrections use the Document Control Number (DCN) which is contained in the Acknowledgement file to identify which submission is being corrected.*

   - *If a batch is **Rejected** – the institution must correct and resubmit the entire batch submission.*

5. How and when can users resubmit a batch file that was ***Rejected*** with validation errors?

   Users can resubmit a batch file that was rejected due to data and/or format issues by:
   - *Correcting and resubmitting the entire batch submission using the DCN provided in the Acknowledgment file.*

   - *Selecting the BSA E-Filing Override function found on the Batch Information Form page of the Batch Form used to submit batch data. The Override function can only be used when the batch submission has no FATAL errors and the same batch file is resubmitted. An Override Reason must be provided in the associated text box to use the Override function. If a batch file has one or more FATAL errors, then the file <u>must</u> be corrected and the Override option <u>cannot</u> be applied.*

6. What happens if users cannot correct the batch validation errors?

   If a filing has the status **Accepted with Warnings**, the filing will still be processed and transmitted to the Enterprise Computing Center – Detroit (ECC-D). The institution must wait until after receiving the Acknowledgement file from the ECC-D in order to correct and resubmit the batch submission. However, if a filing is **Rejected,** the filing cannot be processed and the user must correct the errors and resubmit the entire batch submission (see #5).

7. What is the **Transmitted with Warnings** status in the **Track Status** page?

   When a submission that was previously **Accepted with Warnings** is transmitted to the Enterprise Computing Center – Detroit (ECC-D), the status becomes **Transmitted with Warnings**. The user can click on the **Transmitted with**

Warnings status link to view warnings that were issued for the submission, but the institution must wait until it receives the Acknowledgement file from the ECC-D in order to correct and resubmit the batch submission.

8. What is the icon next to the **Acknowledged** status in the **Track Status** page?

   This icon can be clicked to access the **Submission Warnings** page for this submission in order to view any historical batch validation warnings that were issued at time of submission. Because this submission is in the **Acknowledged** status, the institution must also view the Acknowledgement file from the ECC-D in order to correct and resubmit the batch submission.

9. I am a Secure Data Transfer Mode (SDTM) filer. How does batch validation affect me?

   All batch files, including those submitted using SDTM, are validated using the same batch validation data validation process. Therefore, an SDTM batch file that does not comply with formatting requirements may be **Accepted with Warnings** or **Rejected** depending on the severity of the data issues in the batch file. The correction procedure is similar to those outlined in Table 4, except that once the batch file is corrected, it will be resubmitted using SDTM. There is no override option for SDTM since overrides are a manual process. If SDTM users want to utilize the override option, they must use the online batch form to submit the batch file with the override. Additionally, SDTM users can view the submission warnings or errors as XML data by downloading the file named as *OriginalFilingName*.MESSAGES.XML located in the same directory as the submission Acknowledgement files (see # 12 for more information on the XML data).

10. What changes will users have to make to comply with the batch validation rules?

    Users need to ensure that the data submitted through their batch filings meets regulatory guidelines and batch formatting requirements. These requirements can be found in the appropriate BSA Electronic Filing Requirements document:

    - *BSA Electronic Filing Requirements for the Currency Transaction Report (CTR) (FinCEN Form 104) and Designation of Exempt Person (DEP) (FinCEN Form 110)*

    - *BSA Electronic Filing Requirements for the Currency Transaction Report by Casinos (CTR-C) (FinCEN Form 103)*

11. What is the **Download as XML** button on the **Submission Warnings** or **Submission Errors** page?

The **Download as XML** button allows the user to optionally download the Batch Validation warnings or errors shown on the **Submission Warnings** or **Submission Errors** page as XML data. This XML data is optional and is not required in order to view or fix the batch validation errors/warnings. However, a user can utilize this XML file to process the batch validation errors in a machine readable manner, and allows for automation of the error/warning review and correction process. The XML schema for this XML data can be downloaded from the following URL (you must be logged in to BSA E-Filing to access the URL): https://bsaefiling1.fincen.treas.gov/forms/BSAEFilingBatchMessages.xsd.

The following XML was downloaded as a result of the user clicking the "Download as XML" button on the Error page in Figure 2, or alternatively would be pushed to the filer if this was an SDTM submission:

```
<?xml version="1.0" encoding="UTF-8"?>
<BatchMessages xmlns:xsi="http://www.w3.org/2001/XMLSchema-
instance"xsi:noNamespaceSchemaLocation="BSAEFilingBatchMessages.xsd">
    <Batch trackingID="CB08-00000025" type="CTR" filingName="CTR" status="REJECTED"
filingDate="2008-01-22">
        <Message code="111" level="ERROR">
            <Context lineNumber="127">5A:OrgOrIndivName [Line: 127]</Context>
            <Description>Owner Name is invalid. a. Blank, b. not in proper format, c.
                contains no slashes for individual.</Description>
        </Message>
        <Message code="022" level="ERROR">
            <Context lineNumber="201">3A:TransAmtCashout [Line: 201]</Context>
            <Description>Cash In or Cash out is missing or non-numeric.</Description>
        </Message>
        <Message code="E01" level="ERROR">
            <Context/>
            <Description>Cannot continue processing the submitted file because of
                previous errors encountered. Please fix and re-submit file
            or re-submit file with override applied.</Description>
        </Message>
    </Batch>
</BatchMessages>
```

12. Are there any new error codes associated with batch validation?

New error codes and descriptions are included in the appropriate BSA Electronic Filing Requirements document and are identified in the following tables. Note that new error codes have a prefix of "E" for E-Filing, since they are specific to E-Filing processing.

Table 1 identifies new error codes and descriptions that apply to the CTR, DEP, and CTR-C.

Error Code	Description
E00	This submission cannot be **Accepted** because it contains significant errors. Please fix and resubmit the file.
E01	This submission cannot be **Accepted** because it contains significant errors. Please fix the file and resubmit or resubmit the same file with the override option applied.
E02	This submission has been **Accepted** and will be processed by ECC-D; however, it contains some errors which need to be corrected once this submission has been acknowledged.
E03	This submission had the override option applied and has been **Accepted** to be processed by ECC-D. However, it contains some errors that need to be corrected once this submission has been acknowledged.
E04	The override could not be applied because the submission that was specified to be overridden could not be found or is invalid.
E05	The override could not be applied because the submission that was specified to be overridden is already overridden.
E06	The override could not be applied because the submission that was specified to be overridden is not in the **Rejected** state.
E07	The override could not be applied because the submitted file data has changed, or new/different errors were returned. Please resubmit the unchanged file, fix the file, or resubmit the same file, with the override applied to this submission.
E08	The override could not be applied because the version of the submitted file is not valid for the override option.
E09	The override could not be applied because of errors returned.

Table 1. New CTR, DEP, CTR-C Error Codes and Descriptions.

Table 2 identifies new error codes and descriptions that apply only to the CTR and DEP.

Error Code	Description
079	The **Foreign Currency Country Code** field on the **Currency Transaction Summary (3A) Record** is blank, but an amount was provided in the **Foreign Cash In** field.
078	The **Foreign Currency Country Code** field on the **Currency Transaction Summary (3A) Record** is blank, but an amount was provided in the **Foreign Cash Out** field.
077	The **Foreign Currency Country Code** field on the **Currency Transaction Summary (3A) Record** is filled in, but the **Foreign Cash In** and the **Foreign Cash Out** fields are blank or are all zeros.
076	The **Cash In** or **Cash Out** amount(s) is invalid. Only cash transactions that exceed $10,000 should be reported.
150	The **Method of Identification** field on the **Owner Summary (5A)** record has a value of A,B,C,or D and the **ID Issued By** field and/or **ID Number** field is blank.

Table 2. New CTR and DEP Error Codes and Descriptions.

Table 3 identifies new error codes and description that apply only to the CTR-C.

Error Code	Description
C99	The **Describe ID Credential** field on the **Customer (Part I – Section A) (2C) Record** does not contain a code of A, B, C, or Z.
C98	The **ID Issued by State/Country** field on the Customer **(Part I – Section A) (2C) Record** is blank.
C97	The **ID Number** field on the **Customer (Part I – Section A) (2C) Record** is blank.
C96	The **Other Description** field on the **Customer (Part I – Section A) (2C) Record** is blank when the **Describe ID Credential** field code is Z.
C95	The **Type of Gaming Institution** field on the **Casino Location Header (2A) Record** does not contain a code of A, B, C, or Z.
C94	The **Other Type Description** field on the **Casino Location Header (2A) Record** is blank when the **Type of Gaming Institution** field code is Z.

Table 3. New CTR-C Error Codes and Descriptions.

13. What are the possible scenarios a user may experience with batch validation?

Table 4 identifies specific scenarios users may experience due to batch validation as well as recommended remediation actions by the user to ensure the batch file is submitted successfully.

BSA Batch Validation Scenarios	Action Needed
1. Filer completes batch form, signs, saves and submits form. Filer receives confirmation screen. Filer receives e-mail that submission is **Accepted**. Filer goes to **Track Status** to confirm status is **Accepted**.	No action required if batch file is in **Accepted** status.
2. Filer completes batch form, signs, saves and submits form. Filer receives confirmation screen. Filer receives e-mail that submission is **Accepted with Warnings**. Filer goes to **Track Status** to confirm status is **Accepted with Warnings**. Filer clicks on link **Accepted with Warnings** to review the details.	Filer reviews the warnings on the **Submission Warnings** page by clicking the **Accepted with Warnings** link on **Track Status** for the submission. The filer can also optionally download the warnings by clicking on the **Download as XML** button on this page to receive full detail of the warnings. Filer must wait until **Acknowledgement** is received for the batch file before making any corrections. The institution must wait for the Acknowledgement file because corrections use the Document Control Number (DCN) which is contained in the Acknowledgement file to identify which submission is being corrected.
3. Filer completes batch form, signs, saves and submits form. Filer receives confirmation screen. Filer receives e-mail that submission is **Rejected**. Filers goes to **Track Status** to confirm status is **Rejected**. Filer clicks on link **Rejected** to review the details.	Filer reviews the **Rejection** errors on the **Submission Errors** page by clicking the **Rejected** link on **Track Status** for the submission. The filer can also optionally download the **Rejection** errors by clicking on the **Download as XML** button on this page to receive full detail of the errors. The filer must correct the errors and resubmit the file OR the filer can resubmit the same file with the override option applied if there are no FATAL errors in the batch file.
4. Filer completes batch form with override option checked, enters original submission **Tracking ID** and the reason for the override, signs, saves and submits form. Filer receives confirmation screen. Filer receives e-mail that submission is **Accepted with Warnings**. Filer goes to **Track Status** to confirm status is	Filer reviews the warnings on the Submission Warnings page by clicking the **Accepted with Warnings** link on **Track Status** for the submission. The filer can also optionally download the warnings by clicking on the **Download as XML** button on this page to receive full detail of the warnings. Filer must wait until **Acknowledgement** is received for

7

Accepted with Warnings. Filer clicks on link **Accepted with Warnings** to review the details.	the batch file before making any corrections.

<div align="center">

Table 4. Batch Validation Scenarios and Remediation Actions.

</div>

14. Where do I find information on how to track my submissions?

Section 6.7 *Tracking the Status of Filings* in the User Manual provides information on how to track your submissions.

15. How will customer support be provided?

The BSA E-Filing System Help Desk provides customer support for all users. The BSA E-Filing Help Desk can be contacted by calling 1-888-827-2778 (option 6) or via email at BSAEFilingHelp@notes.tcs.treas.gov. The Help Desk is available Monday – Friday 8:00 a.m. – 6:00 p.m. EST. Please note that the Help Desk is closed on federal holidays.